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November 5, 2024

Via ECF

Hon. Lewis J. Liman  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Freeman et al. v. Giuliani*, 24-mc-00353-LJL

Dear Judge Liman:

I represent Mr. Giuliani (“Defendant”). I write in response to the Court’s Orders, entered on November 4, 2024, and November 5, 2024, directing an in-person conference on November 7, 2024 (rather than a telephone conference), and directing Mr. Giuliani to appear in person.

I am informed that Mr. Giuliani has a contractual commitment, with Frank Speech Network, to perform a live radio broadcast at 7:00 pm on November 7, 2024 (and also on November 8). In order to keep this commitment, he needs to be in his condo in Palm Beach, where he has his broadcasting equipment.

Accordingly, we ask the Court to revert to the prior order for a telephone conference on November 7, 2024, or to reschedule an in-person conference to a date next week.

Finally, we note that broadcasts, such as those described above, currently provide Mr. Giuliani’s only source of earned income. We respectfully suggest that a loss of income, and an expense for travel to New York, should be avoided, if possible.

Respectfully submitted,

/s/ Kenneth A. Caruso  
Kenneth A. Caruso

cc: Counsel of Record (via ECF)